

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

CL 20-277 JRT/BRT

UNITED STATES OF AMERICA,

**INDICTMENT**

Plaintiff,

18 U.S.C. § 2251(a)

v.

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2252(b)(1)

18 U.S.C. § 2253

CHAD THOMAS VANLERBERGHE,

21 U.S.C. § 853(p)

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

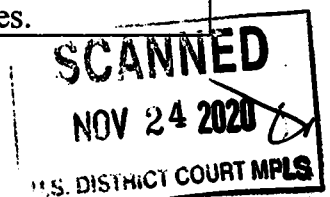
**COUNTS 1-4****(Production and Attempted Production of Child Pornography)**

On or about the dates set forth below, in the State and District of Minnesota, the defendant,

**CHAD THOMAS VANLERBERGHE,**

did attempt to, and did employ, use, persuade, induce, entice, and coerce known minors to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, as set forth below:

| COUNT | DATE       | FILE IDENTIFIER                            | DESCRIPTION OF FILE   |
|-------|------------|--|---|
| 1     | 11/15/2019 | Instagram Photo ID#<br>2177731954468544866 | An image of Victim A, standing naked in a shower/bathtub with her breasts and vagina exposed. Victim A is centered in the image, which is framed in the shower. The image has been edited to obscure Victim A's eyes. |



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|   |            |   |  |
|---|------------|---|--|
| 2 | 11/15/2019 | (2).thumbdata4—<br>1967290299_embedded_2129 | Close-up image of Victim A, from her knees to her head, standing naked in front of a shower/bathtub with her hair wrapped in a towel and her breasts and vagina exposed. Victim A is centered in the image, which is framed in the shower. |
| 3 | 12/10/2019 | Instagram Photo ID #<br>2196127528649746591 | A close-up image focusing on the penis and scrotum of Victim C, an infant. An adult finger is touching the penis.  |
| 4 | 02/14/2020 | Instagram Photo ID #<br>2244035280944091604 | A close-up image of the tip of an adult's penis being inserted into the partially open mouth of Victim C.  |

where such depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, all in violation of Title 18, United States Code, Section 2251(a).

**COUNTS 5–8**  
**(Distribution of Child Pornography)**

On or about the dates set forth below, in the State and District of Minnesota, the defendant,

**CHAD THOMAS VANLERBERGHE,**

did knowingly distribute the following depictions of minor children using a means and facility of interstate and foreign commerce that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by cellular telephone and the Instagram application:

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| COUNT | DATE       | FILE NAME   | DESCRIPTION OF FILE  |
|-------|------------|---|--|
| 5     | 11/15/2019 | Instagram Photo ID #<br>3402823668417103009491<br>28218233413568619_2903<br>1967576810896679791658<br>459463680 | The image of Victim A<br>charged in Count 2.   |
| 6     | 11/17/2019 | Instagram Photo ID #<br>3402823668417103009491<br>28130412154859323_2903<br>4738772895711912954019<br>354509312 | A close-up image focusing on<br>the pelvic area and vagina of<br>Victim B, a prepubescent girl.  |
| 7     | 11/21/2019 | Instagram Media ID #<br>2904223956590150044<br>1974894235746304   | A 22-second video of Victim B<br>removing her tights and<br>stepping into a bathtub. The<br>video focuses on her pelvic<br>area and vagina, and zooms in<br>on her buttocks and genitals as<br>she bends over to step into the<br>bathtub. |
| 8     | 12/10/2019 | Instagram Photo ID #<br>2196127528649746591   | The image of Victim C<br>charged in Count 3.   |

where the production of such visual depictions involved the use of minors engaging in sexually explicit conduct and such visual depictions were of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

### **FORFEITURE ALLEGATIONS**

Counts 1–8 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

Upon conviction of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, data disc, or other

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matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property, including the following property: a Google Pixel 2, Model G011A, IMEI # 3575 3608 6336 916; and a Samsung Galaxy S10e Model SM-G970U, IMEI # 3520 6610 4434 423.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON